

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) MBD No: 13-MC-91223
)
JC TYREE ANDERSON-SCOTT)

**ASSENTED-TO MOTION TO EXCLUDE TIME
FROM SPEEDY TRIAL ACT COMPUTATIONS**

The United States, with the assent of defendant, JC Tyree Anderson-Scott ("ANDERSON-SCOTT"), hereby moves, pursuant to 18 U.S.C. §§ 3161(b) and 3161(h)(8), that the period from August 9, 2013 through October 9, 2013, be excluded from all Speedy Trial Calculations (including any calculations made pursuant to 18 U.S.C. §3161(b)). As grounds therefore, the government states as follows:

1. On August 9, 2013 defendant, **ANDERSON-SCOTT**, was charged by complaint with theft of government property having a value in excess of \$1,000, in violation of 18 U.S.C. § 641.

2. **ANDERSON-SCOTT** was arrested the same day, and had his initial appearance before the Honorable Jennifer C. Boal that afternoon. At the initial appearance, the government moved for an order of detention pending trial and the defendant requested both a detention hearing and a probable cause hearing.

3. On August 26, 2013, defense counsel requested a continuance of the probable cause, detention hearing. Magistrate Judge Boal conducted a detention hearing on August 27, 2013, and issued a decision detaining **ANDERSON-SCOTT** on September 4, 2013.

4. **ANDERSON-SCOTT's** has a pending state court matter in

which the sentencing is scheduled for September 27, 2013. The United States has conferred with counsel for defendant regarding this motion, and the parties believe that the additional time is necessary in order to coordinate the resolution of this matter with the state court proceedings. As such, the parties are engaged in ongoing discussions regarding a possible resolution of this matter that would obviate the need for the return of an indictment and would resolve this matter short of trial. The parties require additional time in order to complete these discussions.

5. The parties therefore believe that the ends of justice served by extending the time in which an indictment must be filed outweigh the best interests of the public and the defendant's in a speedy trial.

6. Based on the foregoing, the government hereby moves that the period from August 9, 2013 through October 9, 2013, be excluded from the Speedy Trial Act calculations pursuant to 18 U.S.C. §3161(h)(8)(A).

7. Defendant, through his counsel, assents to this motion.

ASSENTED TO:

JC TYREE ANDERSON-SCOTT
By His Attorney

s/ Jessica Diane Hedges
JESSICA DIANE HEDGES, ESQ.

Respectfully submitted,

CARMEN M. ORTIZ
UNITED STATES ATTORNEY

s/ Glenn A. MacKinlay
GLENN A. MACKINLAY
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I certify that a copy of this motion was served by email on September 11, 2013 upon the following:

JESSICA DIANE HEDGES, ESQ.

s/ Glenn A. MacKinlay
GLENN A. MACKINLAY
Assistant U.S. Attorney